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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

THOMAS K. KURIAN, individually,	)	CASE NO.: 2:19-cv-01757-GMN-EJY
	)	
Plaintiff/Counterdefendant,	)	
	)	
vs.	)	
	)	
SNAPS HOLDING COMPANY, a North	)	
Dakota Domestic Corporation,	)	
	)	
Defendants/Counterclaimants.	)	
	)	

**STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE**  
**PROPOSED JOINT PRETRIAL ORDER**  
[SECOND REQUEST]

Pursuant to Fed. R. Civ. P. 6, LR IA 6-1 and LR 26-3, the parties, by and through their respective counsel of record, stipulate and agree that there is good cause to extend the deadline for filing the proposed joint pretrial order, as ordered by this Court in its Order filed on September 9, 2022 [ECF No. 61]. This is the second stipulation for extension of the deadline to file a proposed joint pretrial order in this matter.

This action arises out of a contractual dispute that was originally filed in State Court by the Plaintiff/Counterdefendant and removed to Federal Court by Defendant/Counterclaimant under diversity jurisdiction.

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2 Defendant's historical counsel, Rory C. Mattson (admitted pro hac vice) of the law firm  
3 of Messerli & Kramer, P.A., left the firm recently and was the primary attorney litigating this  
4 complex case. Local Counsel Richard G. Campbell, Jr., Esq. was not the attorney that was hired  
5 to try the case by Defendant/Counterclaimant. While Mr. Campbell has diligently monitored the  
6 case, Defendant/Counterclaimant desires that the law office of Messerli & Kramer, P.A. try the  
7 matter. Since the Court's Order of September 9, 2022, Brendan Tupa of Messerli & Kramer has  
8 petitioned for his admission to appear in this case and has been diligently working to get up to  
9 speed on the factual background and remaining issues pending before the Court. However, the  
10 current November 8, 2022 deadline to file the pretrial order does not give him sufficient time to  
11 fully review all of the documents necessary to protect the legal rights of his client. In addition,  
12 there also appears to be some outstanding discovery necessitating supplementation that would  
13 assist the parties in a better evaluation of their claims and defenses as well as preparations for  
14 trial. Thus, good cause exists for an extension of time for the parties to submit a proposed joint  
15 pretrial order.

16 Counsel for Plaintiff/Counterdefendant, E. Brent Bryson, Esq., and Counsel for  
17 Defendant/Counterclaimant, Brendan R. Tupa, Esq., conferred on November 4, 2022 regarding  
18 this stipulation and determined, pursuant to the above rules, that good cause exists to extend the  
19 time to file the proposed joint pretrial order for one-hundred twenty days (120) days until March  
20 8, 2023. Accordingly,

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Case No.: 2:19-cv-01757-GMN-EJY  
Kurian V. Snaps Holding Company  
Stipulation and Order

IT IS HEREBY STIPULATED AND AGREED by and between the parties that good cause exists to grant the parties' stipulation and that the proposed Joint Pretrial Order be filed with this court by March 8, 2023.

DATED this 7th day of November, 2022.

DATED this 7th day of November, 2022.

E. BRENT BRYSON, LTD.

KAEMPFER CROWELL

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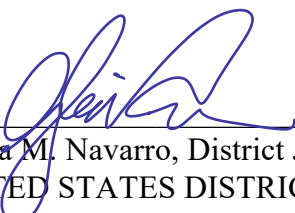
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**ORDER**

**IT IS SO ORDERED.**

Dated this 9 day of November, 2022.

  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT